

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

3/28/2022

**SUBJECT:** Acute Toxicity Review for *Honey Cake*, EPA File Symbol: 777-RUG

**FROM:** Ian Blackwell, M.S., Biologist  
Chemistry and Toxicology Team  
Regulatory Management and Science Branch  
Antimicrobials Division (7510P)

A handwritten signature in blue ink, likely belonging to Ian Blackwell.

**THRU:** Jenny J. Tao, Senior Scientist (Acute Toxicology)  
Chemistry and Toxicology Team  
Regulatory Management and Science Branch  
Antimicrobials Division (7510P)

A handwritten signature in blue ink, likely belonging to Jenny J. Tao.

03/30/2022

**TO:** Marcel Howard, Acting PM Team 34 / Lorena Rivas  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Registrant: RECKITT BENCKISER, LLC.	Case No.: 00318122
Submission No.: 1071178	E-Sub No.: 64649
Action Code Case No.: A500	Action Code: A500
MRID No(s): 51600805 - 51600811	

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
068604	25265-71-8	Dipropylene Glycol	25
		Other Ingredients	<u>75</u>
		Total	100

## 1. **BACKGROUND**

The registrant, RECKITT BENCKISER, LLC., has submitted an application for pesticide registration for their product: *Honey Cake*, EPA File Symbol 777-RUG. To support the acute toxicity data requirements of this product, the registrant cites Substantial Similarity to their product, Reg. No. 777-99, and submits an overall acute toxicity discussion document (MRID 51600805) and an individual discussion document for each of the 6 acute toxicity endpoints in MRIDs 51600806 - 51600811.

The submitted product label of this product states that it is an anti-bacterial and anti-viral “air sanitizer”.

## 2. **FINDINGS/RECOMMENDATIONS**

- a. The Agency has compared the chemical formulation of EPA File Symbol 777-RUG with that of Reg. No. 777-99 and finds that the two products are not Substantially Similar in terms of acute toxicity. The products differ largely in active ingredient content and percentage of solvent.

3. The acute toxicity profile of *Honey Cake*, EPA File Symbol 777-RUG, is currently:

Guideline	Study	MRID	Toxicity Category	Status
870.1100	Acute Oral Toxicity	51600805 51600806	Undetermined	Data gap
870.1200	Acute Dermal Toxicity	51600805 51600807	Undetermined	Data gap
870.1300	Acute Inhalation Toxicity	51600805 51600808	Undetermined	Data gap
870.2400	Primary Eye Irritation	51600805 51600809	Undetermined	Data gap
870.2500	Primary Skin Irritation	51600805 51600810	Undetermined	Data gap
870.2600	Dermal Sensitization	51600805 51600811	Undetermined	Data gap

## 4. **CONCLUSION**

The acute toxicity data requirements have not been met to support the registration of EPA File Symbol 777-RUG.

## 5. **PRODUCT LABELING**

The Agency cannot prescribe precautionary labeling (precautionary statements or First Aid statements) at this time due to the lack of acute toxicity data for EPA File Symbol 777-RUG.